

# DECLARATION OF JESSE H. FORD, III

COUNTY OF MADISON )  
 )  
STATE OF TENNESSEE )

Declarant Jesse H. Ford, III, states as follows:

- 7.2. Handwritten notes of Tennessee Bureau Of Investigation interviews with Jennifer and Cynthia Lambert;

7.3. Any information indicating that Chris Dutton had been convicted of providing law enforcement authorities false information;

7.4. Any information indicating that Chris Dutton had a long history of serious mental illness and drug abuse, including the following documents:

7.4.1. 12/2/92 Tennessee Department of Correction (TDOC) Intake Form recording that Chris Dutton experienced hallucinations and exhibited acute psychotic thought disorganization (attached to this Declaration as Exhibit 4);

7.4.2. 12/14/90 TDOC Initial Classification Psychological Summary recording that Dutton consumed cocaine and LSD and had a history of auditory hallucinations (attached to this Declaration as Exhibit 5);

7.4.3. 2/92 TDOC Progress Record recording that Dutton was hearing voices (attached to this Declaration as Exhibit 6);

7.4.4. 2/6/91 TDOC Health Screening Form recording that Dutton attempted suicide (attached to this Declaration as Exhibit 7);

7.4.5. TDOC New Admissions Data recording that Dutton had attempted suicide and had an extensive drug abuse history (attached to this Declaration as Exhibit 8);

7.4.6. TDOC Medical History recording that Dutton was placed in a psychiatric unit while in the North Carolina prison system (attached to this Declaration as Exhibit 9);

7.4.7. 8/1/91 TDOC Inmate Intake Form recording that Dutton had a long history of mental problems related to drug abuse (attached to this Declaration as Exhibit 10);

7.4.8. 1992-1996 TDOC Inmate Intake Updates and Physicians Orders recording psychiatric medications given Dutton (attached to this Declaration as Exhibit 11);

7.4.9. 1995-1996 TDOC Documents recording Dutton's mental health issues while in confined segregation (attached to this Declaration as Exhibit 12);

7.4.10. 2/28/93 TDOC Psychiatric Intake Evaluation recording that Dutton was diagnosed with poly-substance dependence (with LSD and PCP being Dutton's drugs of choice) and had attempted suicide (attached to this Declaration as Exhibit 13);

7.4.11. A letter written by Dutton in which he discusses his possession by a demon (attached to this Declaration as Exhibit 14).

7.5. A 5/28/94 TDOC Disciplinary Report recording that a correction officer found in Dutton's prison cell a shank (attached to this Declaration as Exhibit 15).

7.6. Any information indicating that the State gave Chris Dutton favorable treatment in exchange for testimony he provided in court proceedings, including the following documents:

7.6.1. 1991-1992 TDOC Locations (attached to this Declaration as Exhibit 16);

7.6.2. 1/23/91 TDOC Transfer Form (attached to this Declaration as Exhibit 17);

7.6.3. 2/8/91 TDOC Initial Classification Summary (attached to this Declaration as Exhibit 18);

7.6.4. 1/14/92 Certificate of Parole; (attached to this Declaration as Exhibit 19);

7.6.5. 11/30/95 TDOC Offender Classification Summary (attached to this Declaration as Exhibit 20);

7.6.6. 3/18/96 Protective Custody Review Report (attached to this Declaration as Exhibit 21);

7.6.7. 3/27/96 TDOC Offender Classification Summary (attached to this Declaration as Exhibit 22);

7.6.8. 3/28/96 TDOC Cold Creek Correctional Facility Personal Property Inventory (attached to this Declaration as Exhibit 23);

7.6.9. TOMIS Program Assignment Notice (attached to this Declaration as Exhibit 24);

7.6.10. 11/18/96 TDOC Progress Record (attached to this Declaration as Exhibit 25);

7.6.11. 1/16/97 TDOC Offender Classification Summary (attached to this Declaration as Exhibit 26).

7.7. Any information indicating that Chris Dutton communicated with government officials about information he had, and actions he was willing to take, as an informant, including the following documents:

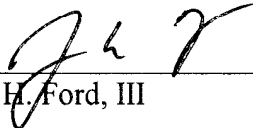
7.7.1. 1994 TDOC Chris Dutton Activities Printout (attached to this Declaration as Exhibit 27);

7.7.2. 1994 TDOC Chris Dutton Activities Printout (attached to this Declaration as Exhibit 28).

8. I do not recall seeing in any of Mr. Hall's prior counsel's files any of the documents or things inventoried in Paragraph 7, above, or any information about the matters Paragraph 7, above, discusses.

9. The State did not at any time prior to, during, or after Mr. Hall's trial inform me about the documents or things inventoried in Paragraph 7, above, or provide me any information about the matters Paragraph 7, above, discusses.

10. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

  
\_\_\_\_\_  
Jesse H. Ford, III

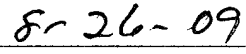
  
\_\_\_\_\_  
Dated

EXHIBIT 1



JAMES G. (Jerry) WOODALL  
District Attorney General  
State of Tennessee, 26th Judicial District  
*Criminal Division*  
P.O. BOX 2825  
JACKSON, TENNESSEE 38302

## SECRETARIES

ANGELA WINBUSH  
BETTY NEWMAN  
GARI LINDSEY  
TONYA SHAVERS

## COUNTIES

MADISON  
CHESTER  
HENDERSON

## TELEPHONE

901-423-5800  
FAX 901-424-9039

## ASSISTANT DISTRICT ATTORNEYS GENERAL

C. F. L.  
D. N. L. LEN  
A. D. OWN  
WRENCE "MICK" NICOLA  
JESSE W. THOMPSON  
FRED L. EARLS  
CHRISTOPHER J. SCHULTZ

CRIMINAL INVESTIGATOR  
CHUCK A. WILSON

CRIMINAL JUSTICE COORDINATOR  
JORGIA M. BOND

June 28, 1995

Mr. Carthel Smith  
Attorney at Law  
85 E. Church St.  
Lexington, Tennessee 38351

RE: STATE OF TENNESSEE VS.

JON HALL, #94-342, 452, 454

Dear Carthel:

Reference is made to your Motions for Discovery and Inspection received by this office on June 27, 1995.

Please be advised that our files are open for your inspection any time during regular office hours, between 8:00 a.m. and 5:00 p.m., and consider this as an official response to your Motion for Discovery and Inspection.

All items of physical evidence, including photographs and tape recordings (if same exist) will be retained by the law enforcement agency involved until trial. Inspection of same will be permitted and scheduled upon request made to the Assistant District Attorney General responsible for the case.

We hope you will take advantage of our "open file policy" in the preparation of your client's defense and will request with particularity any information properly subject to discovery. See *State v. Mallard*, 653 S.W.2d 763 (Tenn. Crim. App. 1983).

Very truly yours,

James G. (Jerry) Woodall  
District Attorney General  
26th Judicial District

JGW/ts

cc: Circuit Court Clerk

EXHIBIT 2



JAMES G. (Jerry) WOODALL  
District Attorney General  
State of Tennessee, 26th Judicial District  
Criminal Division  
P. O. BOX 2825  
JACKSON, TENNESSEE 38302  
June 28, 1995

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## DISTRICT ATTORNEYS GENERAL

STEGALL  
LO H. ALLEN  
H.A. BROWN  
JENICE "NICK" NICOLA  
S.W. THOMPSON  
ED L. EARLS  
THOMAS J. SCHULTZ

## ADJUTANT GENERAL

A. WILSON

## ADJUTANT GENERAL

GIA M. BOND

Mr. Mike Mosier  
204 W. Baltimore  
P. O. Box 1623  
Jackson, Tennessee 38302

RE: STATE OF TENNESSEE VS.

JON HALL, #94-342, 452, 454

Dear Mike:

Reference is made to your Motions for Discovery and Inspection received by this office on June 27, 1995.

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All items of physical evidence, including photographs and tape recordings (if same exist) will be retained by the law enforcement agency involved until trial. Inspection of same will be permitted and scheduled upon request made to the Assistant District Attorney General responsible for the case.

We hope you will take advantage of our "open file policy" in the preparation of your client's defense and will request with particularity any information properly subject to discovery. See State v. Mallard, 653 S.W.2d 763 (Tenn. Crim. App. 1983).

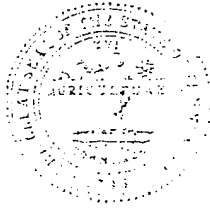
Very truly yours,

James G. (Jerry) Woodall  
District Attorney General  
26th Judicial District

JGW/ts  
cc: Circuit Court Clerk



EXHIBIT 3



JAMES G. (Jerry) WOODALL  
District Attorney General  
State of Tennessee, 26th Judicial District  
*Criminal Division*  
P.O. BOX 2825  
JACKSON, TENNESSEE 38302

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GARI LINDSEY

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FAX 901-424-9039

US DISTRICT ATTORNEYS GENERAL

DONALD H. ALLEN  
SHAUN A. BROWN  
LAWRENCE "NICK" NICOLA  
JAMES W. THOMPSON  
ALFRED L. EARLS  
CHRISTOPHER J. SCHULTZ  
ERNEST T. BROOKS, II

CRIMINAL INVESTIGATOR  
JACK A. WILSON

VICTIM/WITNESS COORDINATOR  
GEORGIA M. BOND  
KATHY BURNET (ASSISTANT)

May 14, 1996

Mr. Clay F. Mayo  
Attorney at Law  
P.O. Box 1625  
Jackson, TN 38302

RE: STATE OF TENNESSEE VS.

JON HALL #94-342 PHOTOGRAPHS-EXHIBIT C

Dear Clay:

Reference is made to your Motions for Discovery and Inspection received by this office on May 14, 1996.

Please be advised that our files are open for your inspection any time during regular office hours, between 8:00 a.m. and 5:00 p.m., and consider this as an official response to your Motion for Discovery and Inspection.

All items of physical evidence, including photographs and tape recordings (if same exist) will be retained by the law enforcement agency involved until trial. Inspection of same will be permitted and scheduled upon request made to the Assistant District Attorney General responsible for the case.

We hope you will take advantage of our "open file policy" in the preparation of your client's defense and will request with particularity any information properly subject to discovery. See State v. Mallard, 653 S.W.2d 763 (Tenn. Crim. App. 1983).

Very truly yours,

*Jerry Woodall* / <sup>64</sup> KB  
James G. (Jerry) Woodall  
District Attorney General  
26th Judicial District

JGW/kb

xc: Circuit Court Clerk

EXHIBIT 4

TENNESSEE DEPARTMENT OF CORRECTION  
PSYCHIATRIC INTAKE EVALUATION  
INSTITUTION: BRUSHY MOUNTAIN STATE PENITENTIARY

NAME: Chris Dutton NUMBER 142826 DOB 7/59 AGE 33 SEX M RACE W  
INTAKE DATE 12/2/92

PRESENTING ISSUES:

Mr. Dutton was received as a NC/PV/transfer. He is currently housed in the A Block unit. He is reporting today for intake evaluation. He ~~is/is not~~ currently maintained on psychotropic medication. He ~~is/is not~~ compliant with his medication regimen at the present time.

BACKGROUND INFORMATION:

Social/Educational History

Mr. Dutton was born in Muskegon, Mich. He has 2 siblings. He has completed the 12th grade in school.

He reports an employment history as a Tree Trimmer and was last self-employed at Muskegon, Michigan. He is married/single/divorced with 0 children. He reports that he ~~does/does not~~ have contact with his family at this time. He does/does not have a military history. Records indicate that he ~~does/does not~~ have history of aggressive/assaultive behavior.

CRIMINAL/INSTITUTIONAL HISTORY

He is serving a 8 yr sentence sentence for 2 counts Theft / 1 Count Burglary. His Release Eligibility Date is 7/92. His expiration date is 1998. There are 0 disciplinary infractions listed in his record, ~~of which are for assault or fighting, with the most recent being in~~. This is his 7 month period of incarceration. For more information see PSI or RAP Sheet.

SUBSTANCE ABUSE HISTORY

Mr. Dutton does/does not indicate history of substance abuse. (if indicated) He indicates that his substance of choice was LSD, PCP, Heroin and that he would use seven days per week. He has/has not participated in a substance abuse program. He reported that his last substance abuse occurred March 1992.  
Polymer substance abuse started at age 12.

PAST PSYCHIATRIC HISTORY

Mr. Dutton acknowledges/denies prior psychiatric treatment. He states he received past treatment at Murphy N.C. Hospital for 3-4 weeks after leaving himself in Cherokee County N.C. Jail. as an inpatient/outpatient. He states he was treated with the following medications in the past Trazodone.

Mr. Dutton states that these medications ~~were/were not~~ beneficial to him at that time. He acknowledges/denies auditory/visual hallucinations at this time or in the past.

PAST MEDICAL HISTORY

He acknowledges/denies a history of head injuries. He is currently being treated for headaches: ibuprofen no medical conditions.

ALLERGIES: PCN; Codeine

MENTAL STATUS:

Mr. ~~Duth~~ ~~is~~ is not oriented x 4. He ~~is~~ is not cooperative with questions. Responses ~~were~~ were not appropriate. Speech ~~is~~ is not normal in tone and content and is goal directed. He ~~acknowledges~~ ~~denies~~ suicidal/homicidal ideations or plans at this time. Hallucinations ~~are~~ are not acknowledged at this time. He voices ~~no~~ delusional content. There ~~is~~ is no evidence of acute psychotic thought disorganization. Insight and judgement are ~~fair~~. He is requesting treatment for... *drug treatment program.*

Behavioral Observations:

*Appeared slightly anxious but coherent & relevant.  
He has some unusual / idiosyncratic thoughts  
but he is not psychotic.*

Clinical Impression:

*Polysubstance Abuse since approx age 12 appears  
primary with hallucinogens his drug of choice.  
Doesn't appear delusional but expresses unusual thought  
that appear to be fantasy / drug originated!*

DIAGNOSTIC IMPRESSIONS:

Axis I: *Polysubstance Abuse*  
Axis II: *R/O Schizotypal Personality D.O.*  
Axis III:  
Axis IV:  
Axis V:

TREATMENT RECOMMENDATIONS:

*Follow-up w/ Dr. Roswell to continue  
Trayalone. Referred to chaplain for AA / NA Meetings*

Psychiatrist

Psychologist

*R. T. ... H.S.*  
Psychological Examiner


MIIPS 2

EXHIBIT 5

ADULT SERVICES  
TENNESSEE DEPARTMENT OF CORRECTION

CONFIDENTIAL

## INITIAL CLASSIFICATION PSYCHOLOGICAL SUMMARY

NAME Chris DuttonNUMBER 142826PSYCHOLOGICAL EXAMINER Phil King DATE 12-14-90

## TESTS ADMINISTERED:

Rev. BETA II	<u>X</u>	GATB	<u>      </u>	WRAT	<u>X</u>	CPS	<u>X</u>	TABE	<u>X</u>
Slosson	<u>      </u>	WAIS-R	<u>      </u>	PPVT	<u>      </u>	MMPI	<u>      </u>		

TESTS SYNOPSIS/ASSESSMENT COMMENTS: Mr. Dutton is a 31 year old white male committed from Bradley County who is currently serving his second period of incarceration. When asked about the charges against him at this time, Mr. Dutton does accept responsibility for having committed the crime. When asked about his alcohol and drug consumption, Mr. Dutton indicates that he will consume up to \$1,000.00 worth of Cocaine, LSD, Marijuana, and Alcohol in a week's time. Testing/interview does reveal a substance abuse of alcohol/drug which was verified by Mr. Dutton. At this time, Mr. Dutton expresses an interest in working while incarcerated. He is making a fair adjustment to his incarceration at this time, and it is anticipated that he will continue to do so. At this time there is not a good family relationship.

The revised Beta suggests that Mr. Dutton is probably functioning at an average level of intellectual ability.

The following scores were obtained on the WRAT/TABE: 10 in reading, 11 in spelling, and 9 in arithmetic.

Mr. Dutton presented himself for interview in an appropriate manner appearing well oriented to time, place, person, and present circumstances. His memory for recent and remote events seemed to be intact. He reported a history of blackout periods associated with substance abuse, and he denied ever experiencing significant head trauma or seizure activity. His speech and communication were relevant, rational, coherent, and devoid of looseness of association, ideas of reference, delusional content, hallucinations, or other indices of current psychosis. He did, however, report a history of ego-dystonic auditory hallucinations associated with psychosocial stressors. His mood, affect, and overall mental status appeared unremarkable on this date.

## Recommendations:

1. Referral to contract Psychiatrist.
2. A & D Treatment Program.

PK:sga  
1-8-91

EXHIBIT 6



### PROBLEM ORIENTED - PROGRESS RECORD

NUMBER 142826

E=EVALUATION

---

*conspiracy* in the ...

EXHIBIT 7

Count Ret.  
1/6

## TENNESSEE DEPARTMENT OF CORRECTION

## HEALTH SCREENING FORM

31 yrs.

Inmate's/Student's Name: Chris Allen Dutton TDOC Number: 142826Receiving Institution: BNSP Date: 2-6-91

## Inquire Into:

1. Are you currently being treated for any illness or health problem (including dental, venereal disease, or other infectious diseases)? Yes ☒ No. If yes, describe: \_\_\_\_\_
2. Do you have any medical or dental complaints at this time? Yes ☒ No. If yes, describe: \_\_\_\_\_
3. Are you currently on any medication(s)? Yes ☒ No If yes, was the medication transferred with the inmate/student? Yes ☒ No
4. Have you recently used alcohol or other drugs? Yes ☒ No If yes, describe: (Include type, mode, amount, frequency, last use, problems resulting from discontinuance, detoxification involvement) \_\_\_\_\_
5. Have you recently or in the past received treatment or been hospitalized for any mental disturbance(s) or suicidal behavior? Yes ☒ No If yes, describe: Nov. 89 Raleigh Central Prison attempted suicide
6. Do you have any allergies? Yes ☒ No If yes, describe: \_\_\_\_\_

## Observe:

1. Behavior (including state of consciousness, mental status, appearance, conduct, tremor and sweating): Yes ☒ Normal Abnormal If abnormal, describe: \_\_\_\_\_
2. Body deformities, condition of skin (including needle marks, trauma markings, bruises, lesions, jaundice, rashes and infestations): Yes ☒ No If yes, describe: \_\_\_\_\_

## Disposition:

- ☒ Housed with general population and instructed to make sick call for medical and/or dental care B Black
- ☐ Housed with general population and prompt referral appointment with health provider
- ☐ Referred to appropriate health provider on an emergency basis

Tony Jefferson  
Signature and Title of Screening Staff

I have received a copy of the procedure for obtaining health care (medical, dental and/or mental health). It has been explained to me and I understand how to access treatment.

Distribution: Health Record

Chris A Dutton  
Signature of Inmate/Student

EXHIBIT 8

9/13 BK

Gross Release

CONFIDENTIAL

## NEW ADMISSIONS DATA

NAME: Chris A. Dutton DOB#: 142826 DOB: [REDACTED] 89  
 RACE: W UNDER 21: Y ( ) N ( ) HIGHEST GRADE COMPLETED: L2 (V)  
 REC'D CENTER: 11-27-91 REC'D FROM: BR REC'D TDUC: 12-13-90 NC  
 SENT: 2/92 SED: 6-9-90 RED / PP: 1-12-93 EXP: 3-27-98  
 CHARGES: Burg - Other # 891033ct1, Theft / Prop  
# 891033ct2

JUDGE / COUNTY: Mohrman / BradleyCUSTODY LEVEL: PR/MT CAF: +1 OVERRIDE:LAST RECLASS: 11-27-91 NEEDS ASSESSMENT: S3A, B2A, W2A, L2ACLASSIFICATION RECOMMENDATIONS: Construction WorkerWORK CLASS: B-L DISABILITIES: Orthopedic Imp,ArthritisASSIGNED COUNSELOR: TownesDISCIPLINARY RECORD: NoneINCOMPATIBLES: None DETAINERS: NonePAROLE DATA: None Recommended Fti

TDUC WORK EXPERIENCE: SEE ATTACHED. FREE WORLD EXPERIENCE:

COMMENTS: PSI indicates prior suicide attempts at NC DOC.  
 Subject self-reports neck injury rec'd at Bradley Co Jail. Extensive  
 history of substance abuse since youth. Testing indicates average  
 range of intelligence, and unremarkable mental status.

Reviewed  
 12/2/91  
 GCF

EXHIBIT 9

CR-2007

Name: Chris A Putton Number: 142826

Date \_\_\_\_\_ Name of Hospital \_\_\_\_\_ Location \_\_\_\_\_ Reason \_\_\_\_\_

No

Yes

FOR CLINIC USE ONLY

- \_\_\_ u. Any history of treatment in a Mental Health Clinic or Psychiatric Hospital?

☒ Psych UNIT Prison in N.C.

5.

- \_\_\_ a. Has there been any change in your weight in the past year?

☒

1. Lost \_\_\_\_\_ How much \_\_\_\_\_  
2. Gain ☒ How much 20 lbs

- \_\_\_ b. Have you ever had excessive anxiety/nervousness, depression or worrying?

☒ has been referred to MFT

- ☒ c. Have you noticed a change in size or color of any wart or mole, or the appearance of a new one?

- ☒ d. Any itching, skin rash or boils?

- \_\_\_ e. Do you use tobacco?

☒

- ☒ 1. Chew

- ☒ 2. Pipe

- ☒ 3. Cigars

- \_\_\_ 4. Cigarettes

☒

- \_\_\_ 5. How many cigars, cigarettes, or pipes do you smoke in 24 hrs.? 20

6. HEAD AND NECK

No

Yes

- \_\_\_ a. Do you have dizzy spells?

☒ no prob. now by h/d

- \_\_\_ b. Do you have frequent headaches?

☒ daily since was beaten up age 24

How often? constant

What medicine helps

your headaches? ibuprofen, 800

EXHIBIT 10





STATE OF TENNESSEE  
DEPARTMENT OF CORRECTION  
DIVISION OF ADULT INSTITUTIONS  
SOUTHEASTERN TENNESSEE STATE  
REGIONAL CORRECTIONAL FACILITY  
ROUTE 4, BOX 600  
PIKEVILLE, TENNESSEE 37367

TENNESSEE DEPARTMENT OF CORRECTIONS  
INMATE INTAKE

NAME: Dutton, Chris

SEX: M

NUMBER: 142826

DATE OF INTAKE: 8-1-91

DATE OF BIRTH: [REDACTED] 59

FACILITY: STS RCF

AGE: 32

INTAKE WORKER: P. Manire *Selen*  
RE.

PRESENTING PROBLEM

*Insomnia*

MENTAL STATUS EXAM:

*Slender W/M who looks about his stated age. Oriented x4. Psychomotor functions operational. Good eye contact except that he held the left eye constantly due to sinus pain. Speech is clear & articulate. Thought processings are affectively appropriate & sequential. No gross M.H. pathology either emitted or elicited. Subdued, somer mood due to sinus pain.*

PSYCHIATRIC HISTORY:

*PT. relates long hx of M.H. problems related to Drug abuse.*

MEDICAL HISTORY

acute sinus infection

ALCOHOL AND DRUG HISTORY:

yes    yes

SOCIAL HISTORY

Divorced

From a broken home

Reared by Grandparents: D. Mother died when pt was 12.  
M. Father " " " " 12.

on own - largely since then.

SEXUAL DEVELOPMENT:

average

EMPLOYMENT HISTORY

*Tree trimming, etc.  
own business*

CRIMINAL HISTORY:

A. JUVENILE

B. ADULT

C. FAMILY

*Multiple charges*

MILITARY HISTORY

*U.S. Army - 2 yrs in Korea*

PSYCHOLOGICAL EVALUATIONS:

no current testings done/available

REFERRAL RECOMMENDATIONS:

Refer to Dr. DeRiviter

DIAGNOSIS:

axis I: adult disorder - mixed emotions

axis II: antisocial

axis III: no sinus infection

axis IV: away from loved ones: - moderate/severe

axis V: GAF 70

P. Maurice Siler

P. MAURICE SILER, P.E. II  
MENTAL HEALTH PROFESSIONAL

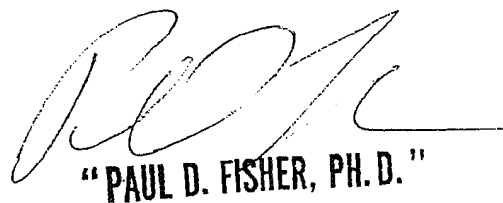
  
"PAUL D. FISHER, PH.D."

EXHIBIT 11

## TENNESSEE DEPARTMENT OF CORRECTION

3D107

## Psychiatric Intake Update

R.M.S.I.

Inmate: Chris Dutton Number: 142826 Facility: RMSI  
 DOB: \_\_\_\_\_ Sex: M Custody Status: \_\_\_\_\_ Race: W Intake Date: \_\_\_\_\_

COURSE OF TREATMENT TO DATE

Define Problem Areas: 35y W<sup>o</sup> c Dx below trl c Dosepin 200mg QHS,  
reports a little anxiety over upcoming parole h<sup>rs</sup>, feels Dosepin helps  
control anxiety

Medications: \_\_\_\_\_

CURRENT MENTAL STATUS

After W<sup>o</sup> is aware of p<sup>ro</sup> + no th<sup>o</sup> c multiple t<sup>o</sup>ns; cooperative &  
interactive, speech is in a<sup>l</sup> & rhythm, th<sup>o</sup> is logical & goal directed,  
PAH/it/it<sup>o</sup>, affect euthymic, & is intact for population

DIAGNOSTIC IMPRESSIONS

Axis I: Dysthymia, Anxiety D/O NOS  
 Axis II: Antisocial Personality D/O  
 Axis III: Stress H<sup>o</sup>  
 Axis IV: Severe - incarceration  
 Axis V: 70

TREATMENT RECOMMENDATIONS

Will continue Zinegan @ 200mg po QHS, & h<sup>o</sup> - it month

Signature: [Signature] 1/2/95 Signature: \_\_\_\_\_  
 Staff Psychiatrist Date Staff Psychologist Date

Signature: \_\_\_\_\_ Signature: \_\_\_\_\_  
 Registered Nurse Date Psychological Examiner/MHPS Date

Original: Health Record  
 Yellow: Programmatic Record  
 Pink: Warden



## PHYSICIAN'S ORDERS

372-78-9523

NAME

Du Hon Chris

ROOM NO.  
(ADDRESS)

142826

HOSP. NO.

Bmsp

PHYSICIAN

Littell

Drug Allergies

Date  
& TimeAnother brand of drug identical in form  
and content may be dispensed unless checkedDO NOT USE THIS SHEET  
UNLESS A RED NUMBER SHOWSNurse's  
Initials

DEC 03 1992

Desyrel 150 QHS

DEC 03 1992

DELVIN E LITTELL MD

DEC 15 1992

D/c Desyrel

Uistaril 50mg QHS X 30

Motrin 800 TID

DEC 15 1992

DELVIN E LITTELL MD

JAN 12 1993

Uistaril 50mg QHS

Motrin 800 TID

JAN 12 1993

DELVIN E LITTELL MD

Uistaril 50mg QHS

Motrin 800 TID

FEB 09 1993

800  
A

DELVIN E LITTELL MD



EXHIBIT 12

TENNESSEE DEPARTMENT OF CORRECTION  
MENTAL HEALTH SCREENING REPORT

RMSI

INMATE NAME Dutton, Chris NUMBER 142826 SEX ma  
FACILITY RMSI UNIT 3 CELL D107 DATE OF SCREENING 2/3/96  
TYPE OF SCREENING: 30 DAY SEGREGATION \_\_\_\_\_ 90 DAY SEGREGATION / OTHER \_\_\_\_\_  
MENTAL STATUS SCREENING:

YES	NO	
(+)	( )	RESIDENT EXHIBITED APPROPRIATE AFFECT
(+)	( )	THOUGHT PROCESS WAS ORDERLY AND RELEVANT
(+)	( )	PERCEPTION PROCESSES WERE INTACT
(+)	( )	RESIDENT WAS ORIENTED 4X, PERSON, PLACE, TIME, CIRCUMSTANCE
(+)	( )	MEMORY PROCESSES WERE INTACT
(+)	( )	JUDGEMENT & INSIGHT WERE WITHIN NORMAL LIMITS FOR THIS POPULATION

SUBJECTIVE/OBJECTIVE: "in doing OK"ASSESSMENT: Adequate adjustment to IAS.PLAN: Review within 90 days.REFERRAL TO: Continue to be followed by Dr. Pruitt

SIGNATURE OF MENTAL HEALTH PROFESSIONAL:

Joe R. Smith, M.D.  
K. N. Amador, Ph.D.

TITLE

Ed ExamDATE 2/3/96

ORIGINAL:

HEALTH RECORD

OPTIONAL COPY: WARDEN

CR-2629 (Rev 5/89)

RDA-1167

## TENNESSEE DEPARTMENT OF CORRECTION

RMSI

## PROBLEM ORIENTED - PROGRESS RECORD

 NAME: Chris Dutton NUMBER 142826

SUBJECTIVE      O=OBJECTIVE      A=ASSESSMENT      P=PLAN      I=INTERVENTION      E=EVALUATION

Date	Time	Prob. No.	
9/6	7:30 pm		Psych - RMSI 3644105 is Dorian (DOB 10/10/70), reports is sleeping a lot too is stuck in his cell, reclassified to keep security per pt, to go to Pt. Pillow, denies any violence, doesn't go to work as he has little money, most "mostly good", "don't get in" to me a little bit; 0 ST, feels medication where it needs to be. Pt. alert, speech nl, 0 psychosis, affect euthymic APP Pt. stable - will continue on current case for 2 months (Penell, MD)
9/7	3:02 pm		Psych - RMSI Chart reviewed, orders signed (Penell, MD)
9/10	11:00 am		Psych - RMSI Chart reviewed, orders signed (Penell, MD)

## TENNESSEE DEPARTMENT OF CORRECTION

## MENTAL HEALTH TREATMENT PLAN

Treatment Period 1/17/96 To 7/16/96

PROBLEM	3 MONTH TX GOALS	6 MONTH TX GOALS	MODALITY/FREQUENCY	DATE GOAL MET	PROVIDER
Depressed mood and anxiety	Stabilize mood	Maintain stabilized mood	Doxepin 100 mg p.o. a 4pm and HS. HS snack with med		Pruett
	Mental health screening	Mental health screening	Review monthly every <del>month</del> <del>health</del> <del>to</del> quarterly		Mount, MD

Signatures: Inmate Chris A. Dutton Date: \_\_\_\_\_

Comment(s): \_\_\_\_\_

Staff: Dr. J. M. Pruitt Date: 1/17/96J. M. Pruitt, PsyD Date: 1/17/96

Mental Health Professional(s)

Pruett, MD Date: 1/23/96

Psychiatrist/Physician

Receiving Facility Provider: \_\_\_\_\_ Date: \_\_\_\_\_

Continue Current Plan: \_\_\_\_\_ Modification: \_\_\_\_\_ New Plan Required: \_\_\_\_\_

Original: Inmate's Health Record  
Copy: Programmatic Record  
Warden

TENNESSEE DEPARTMENT OF CORRECTION

RMSI

PROBLEM ORIENTED -- PROGRESS RECORD

Chris Dutton

NUMBER 1458X

SUBJECTIVE

O=OBJECTIVE

A=ASSESSMENT

P=PLAN

I=INTERVENTION

E=EVALUATION

te	Time	Prob. No.	
1/5	8:00 am		<p>Bych-RMSI</p> <p>35 up w/ O &amp; D of Dysthymia, Anxiety, D.O.N.O.S &amp; ASPD</p> <p>100 mg Dexamprone 30mg @ 4pm &amp; 50mg @ 8pm, reports he is doing well, up for reclassification in 1 hr, mood good, sleeping well, B.P.</p> <p>A - alert, speech nl, B.P. 140/90, affect euthymic &amp; full range.</p> <p>APP Stable - Will continue current meds 1 hr T-II months (H. Smith, MD)</p>
1/2	7:30 pm		<p>Bych-RMSI</p> <p>Chart reviewed, orders signed (H. Smith, MD)</p>
1/4	6:00 pm		<p>Bych-RMSI</p> <p>Chart reviewed, orders signed (H. Smith, MD)</p>

Do Not Write on Back

CR-1884  
(Rev. 8/90)

30107

## TENNESSEE DEPARTMENT OF CORRECTION

## INSTITUTIONAL MENTAL HEALTH SERVICES REFERRAL

TO: Dutton Chris NUMBER: 142826 INSTITUTION: RMSI  
Last First Middle 30107EXISTING PROBLEMS: Requests to see psych to discuss meds.ORDERED BY: Wm Casarek DATE: 12/5/95 TIME: 9:30 a.m.  
(Signature/Title)

SEND REFERRAL FORM TO INSTITUTIONAL HEALTH ADMINISTRATOR

LIVED BY: Jae Mount, PsyD Exam DATE: 12/5/95 TIME: \_\_\_\_\_  
(Signature/Title Mental Health Professional)REFERRAL DISPOSITION (Course of Action): I/M Dutton is requesting an  
increase in his medication (Sinequan) to 100mg  
4pm and H.S. It stated that he is now "locked down"  
23 hrs. per day. He gave me details as to why he  
lost his job with Sinequan to 100mg 4pm & H.S. per pt.  
request Powell, MDDATE: 12/5/95 TIME: \_\_\_\_\_Jae Mount PsyD Exam  
Signature/Professional Title

Original: Inmate's Health Record

RDA 1450

EXHIBIT 13

## TENNESSEE DEPARTMENT OF CORRECTION

## Psychiatric Intake Evaluation

Inmate: CHIS OUTON Number: 142826 Facility: RMSI  
DOB: [REDACTED] Sex: M Custody Status: \_\_\_\_\_ Race: W Intake Date: 2/28/93

PRESENTING ISSUES: 33 yr old male, hx of depression, anxiety  
& polysubstance abuse. now on SSRI.

BACKGROUND INFORMATION: (Social/Education History, Criminal/Institutional History, Substance Abuse History, etc.)

HS. Education seems to be good, this  
is 4th prison sentence, hx of polysubstance  
abuse, 1 LSD, PCP, as well as alcohol.

PAST PSYCHIATRIC/PSYCHOLOGICAL TREATMENT HISTORY:

At this point, been treated with Zoloft but  
this was not working. Died to visitation T  
previous suicide attempt 1988 by hanging  
while in jail

Original: Health Record  
Yellow: Programmatic Record  
Pink: Warden